

Hon. James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

v.

WORLD VISION, INC.,

Defendant.

Case No.: 2:21-cv-00920-JLR

**DECLARATION OF CASIMIR
WOLNOWSKI IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT
ON LIABILITY**

NOTE DATE: MAY 5, 2023

Casimir Wolnowski, upon oath affirms and declares:

1. I am an attorney and the senior managing counsel at Nisar Law Group, P.C., counsel for the plaintiff Aubry McMahon ("Plaintiff"). I am admitted to practice before this Court in this matter *pro hac vice*. I am competent to testify and make the following statements based upon my personal knowledge. If called to testify, I would repeat and affirm each and every statement made herein.

2. Attached as Exhibit 1 is a true and correct copy of the job posting for customer service representative, Bates stamped WV-000048-50 produced in discovery.

3. Attached as Exhibit 2 is a true and correct copy of the "History of Events and

Comments” as part of Defendant’s applicant tracking system, Bates stamped WV-000065 produced in discovery.

4. Attached as Exhibit 3 is a true and correct copy of the January 5, 2021 written offer of employment sent to Plaintiff, Bates stamped WV-000078-79 produced in discovery.

5. Attached as Exhibit 4 is a true and correct copy of the January 5, 2021 email sent by Plaintiff to Catherine Miolla, Bates stamped WV-000080 produced in discovery.

6. Attached as Exhibit 5 is a true and correct copy of the phone screening interview document, Bates stamped WV-000067-70 produced in discovery.

7. Attached as Exhibit 6 is a true and correct copy of an email chain between Plaintiff and Catherine Miolla culminating in an email sent by Catherine Miolla to Plaintiff on January 8, 2021, Bates stamped WV-000081-82 produced in discovery.

8. Attached as Exhibit 7 is a true and correct copy of a document entitled “Contextual guidance and examples” as part of Defendant’s “Giving Word to our Faith” framework documents, Bates stamped WV-006164 produced in discovery.

9. Attached as Exhibit 8 is a true and correct copy of pertinent pages from a “Giving Word to our Faith” handbook, Bates stamped WV-006119-28 produced in discovery.

10. Attached as Exhibit 9 is a true and correct copy of the transcript of the February 24, 2023 deposition of Plaintiff.

11. Attached as Exhibit 10 is a true and correct copy of the transcript of the March 10, 2023 deposition of Defendant’s Rule 30(b)(6) designee—Melanie Freiberg.

12. Attached as Exhibit 11 is a true and correct copy of the transcript of the March 2, 2023 deposition of Catherine Miolla.

13. Attached as Exhibit 12 is a true and correct copy of the transcript of the March

1 8, 2023 deposition of Christine Talbot.

2 14. Attached as Exhibit 13 is a true and correct copy of the transcript of the
3 February 16, 2023 deposition of Melanie Freiberg.

4 15. Attached as Exhibit 14 is a true and correct copy of a guidance document used
5 to assist customer service representatives in communicating with donors, Bates stamped WV-
6 006113-14 produced in discovery.

7 I declare under the penalty of perjury under the laws of the United States that the
8 foregoing is true and correct to the best of my knowledge.

9 DATED: April 11, 2023

/s/ Casimir Wolnowski